

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JEFFREY LYNN GOSS	:	
Debtor	:	CASE NO. 4:23-bk-00256
:		
JPMORGAN CHASE BANK,	:	
NATIONAL ASSOCIATION,	:	
Movant	:	
:		
v.	:	
:		
JEFFREY LYNN GOSS,	:	
Respondent	:	
:		
:		
:		

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. The Debtor has made all post-petition payments and this averment is therefore denied.
Debtor's counsel has forwarded copies of all payment transmissions to Movant's counsel.
7. The Debtor has made all post-petition payments and this averment is therefore denied.
Debtor's counsel has forwarded copies of all payment transmissions to Movant's counsel.
8. Admitted that the property is worth at least \$776,230.00. Proof of amounts owed is demanded at trial and this averment is therefore denied.

9. Movant is adequately protected by a substantial equity cushion and this averment is therefore denied. The premises is the Debtor's home and is essential to his reorganization. Proof that Movant will suffer irreparable harm is demanded at trial and this averment is therefore denied.
10. Denied that Rule 4001(a)(3) should not be applicable and denied that the Movant should be allowed to immediately enforce and implement the Order granting relief from the automatic stay.
11. Proof that Movant has the promissory note is demanded at trial and this averment is therefore denied.
12. Denied that Movant is entitled to relief from stay.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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